

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i> v. GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-844-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i> v. JANE NELSON, et al., <i>Defendants.</i>	1:21-cv-0786-XR

LULAC PLAINTIFFS’ RULE 26(A)(3) DISCLOSURES

Plaintiffs Texas LULAC (“LULAC”), Texas Alliance for Retired Americans (“TARA”), Texas American Federation of Teachers (“AFT”), and Voto Latino (collectively “LULAC Plaintiffs”), pursuant to the Court’s March 30, 2023 Second Amended Scheduling Order (ECF No. 579), the Court’s order at the parties’ July 11, 2023 hearing (ECF No. 661 at Tr. 43:12–44:1), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, hereby submit their pretrial disclosures.

- The LULAC Plaintiffs’ pre-trial disclosure of witnesses is incorporated in the Private Plaintiffs’ Joint Pre-Trial Disclosure of Witnesses filed by the LUPE Plaintiffs (ECF No. 687);
- The LULAC Plaintiffs’ Exhibit List is reflected in Table A below; and
- The LULAC Plaintiffs’ Deposition Designations are reflected in Table B below. The relevant excerpts are highlighted in the attached Exhibit 1.

The LULAC Plaintiffs incorporate by reference all exhibits and deposition testimony designated by all other private Plaintiffs to this action, Plaintiff United States, Defendants, and Defendant-Intervenors. The LULAC Plaintiffs reserve the right to amend their disclosures to include witnesses, exhibits, or deposition testimony that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures made under Rules 26(a)(3)(A)(i)–(iii).

TABLE A – LULAC PLAINTIFFS' EXHIBIT LIST						
PX No.	Description	Dep. Ex No.	Beg. Bates No.	End Bates No.	Ex. Date	Offer
LULAC -01	Texas Senate Bill 1 Enrolled Version				2021.09.01	Expect to offer
LULAC -02	February 28, 2022 Expert Report of Dr. Kenneth R. Mayer (also available at ECF No. 639-6)				2022.02.28	Expect to offer
LULAC -03	April 29, 2022 Supplement to Expert Report of Dr. Kenneth R. Mayer				2022.02.29	Expect to offer
LULAC -04	March 6, 2023 2022 General Election Expert Report of Dr. Kenneth R. Mayer (as modified by the April 20, 2023 expert report)				2023.03.06	Expect to offer
LULAC -05	April 28, 2022 Expert Report of Dr. Allan Lichtman				2022.02.28	Expect to offer
LULAC -06	February 28, 2022 Expert Report of Dr. Loren Collingwood				2022.02.28	Expect to offer
LULAC -07	April 29, 2022 Supplement to the Expert Report of Dr. Loren Collingwood				2022.04.29	Expect to offer
LULAC -08	February 10, 2023 General Election Report of Dr. Loren Collingwood (as modified by February 27, 2023 notice of correction)				2023.02.10	Expect to offer
LULAC -09	ECF No. 639-1 Declaration of Zeph Capo				2023.06.23	Expect to offer
LULAC -10	ECF No. 639-2 Declaration of Domingo A. Garcia				2023.06.23	Expect to offer

LULAC -11	ECF No. 639-3 Declaration of Gene Lantz				2023.06.23	Expect to offer
LULAC -12	ECF No. 639-4 Declaration of Ameer Patel				2023.06.23	Expect to offer
LULAC -13	ECF No. 639-7 May 6, 2022 30(b)(6) Dep. Tr. of Keith Ingram				2023.06.23	Expect to offer
LULAC -14	ECF No. 639-8 April 26, 2022 30(b)(6) Dep. Tr. of Keith Ingram				2023.06.23	Expect to offer
LULAC -15	ECF No. 639-9 May 2, 2022 SOS's Responses and Objections to U.S. Interrogatories				2023.06.23	Expect to offer
LULAC -16	ECF No. 639-10 May 11, 2022 Attorney General's Verification of State Defendant's Responses and Objections to U.S. Interrogatories				2023.06.23	Expect to offer
LULAC -17	ECF No. 639-11 April 20, 2022 30(b)(6) Dep. Tr. of Callanen				2023.06.23	Expect to offer
LULAC -18	ECF No. 639-12 Defendant El Paso County Elections Administrator Lisa Wise's March 31, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories				2023.06.23	Expect to offer
LULAC -19	ECF No. 639-13 Defendant Dyana Limon-Mercado's March 23, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories				2023.06.23	Expect to offer
LULAC -20	ECF No. 639-14 Defendant Yvonne Ramon's May 10, 2022 30(b)(6) deposition transcript				2023.06.23	Expect to offer
LULAC -21	ECF No. 639-15 Defendant Michael Scarpello's April 29, 2022 Rule 30(b)(6) deposition transcript				2023.06.23	Expect to offer

LULAC-22	ECF No. 639-18 Defendant Bexar County Election Administrator Jacquelyn Callanen's March 17, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories				2023.06.23	Expect to offer
LULAC-23	ECF No. 639-19 Dr. Henry Flores's February 28, 2022 expert report				2023.06.23	Expect to offer
LULAC-24	(Deposition Exhibit) December 12, 2021 Email from the SOS's office	Ingram 18	STATE019731	STATE019731	2021.12.20	May offer
LULAC-25	(Deposition Exhibit) Black Ballot Rejection Rates	Obakozuwa 18			2022.03.29	May offer
LULAC-26	(Deposition Exhibit) April 7, 2022 email from Ingram to Rep. Williamson	Ingram 4	STATE087299	STATE087305	2022.04.07	May offer
LULAC-27	(Deposition Exhibit) Bexar County mailing	Callanen C			2022.04.20	May offer
LULAC-28	(Deposition Exhibit) Elections Division Webinar	Ingram 2			2022.04.20	May offer
LULAC-29	(Document) Ballot Secrecy Envelope		STATE074882	STATE074883	2017.07.00	May offer
LULAC-30	(Document) Poll Watchers Guide (2018)		STATE081913	STATE081935	2018.01.00	May offer
LULAC-31	(Document) Qualifying Voters on Election Day Handbook (2018)		STATE082001	STATE082085	2018.01.00	May offer
LULAC-32	(Document) OAG list of pending election-related fraud prosecutions		STATE090413	STATE090418	2021.03.15	May offer
LULAC-33	(Document) Letter from Texas Legislators		TXLEG_0000734	TXLEG_319662	2021.03.31	May offer
LULAC-34	(Document) HB 3 bill summary		STATE090437	STATE090439	2021.07.08	May offer
LULAC-35	(Document) OAG memo regarding SB 1		STATE090451	STATE090454	2021.07.09	May offer
LULAC-36	(Document) Blank Carrier Envelope		STATE078258	STATE078260	2021.12.00	May offer
LULAC-37	(Document) OAG list of resolved prosecutions of election fraud from 2004 to 2020		STATE001144	STATE001159	2021.12.30	May offer

LULAC -38	(Document) Poll Watchers Guide (2022)		STATE1 06313	STATE10 6337	2022.01.00	May offer
LULAC -39	(Document) Blank Ballot Rejection Form		STATE1 50492	STATE15 0493	2022.01.00	May offer
LULAC -40	(Document) Blank Notice of Carrier Defect - Carrier Envelope Returned to Voter by Mail		STATE1 51853	STATE15 1854	2022.01.00	May offer
LULAC -41	(Document) Blank Notice of Carrier Defect - Voter Notified by Phone or Email		STATE1 51855	STATE15 1856	2022.01.00	May offer
LULAC -42	(Document) Blank Notice of Rejected ABBM - Personal Identification Numbers not on Voter Record		STATE0 90619	STATE09 0620	2022.01.00	May offer
LULAC -43	(Document) Blank Notice of Rejected ABBM -Missing or Incorrect Personal ID Numbers		STATE1 05693	STATE10 5694	2022.01.00	May offer
LULAC -44	(Document) Blank Notice of Rejected Application for Ballot by Mail		STATE1 38595	STATE13 8596	2022.01.00	May offer
LULAC -45	(Document) Blank Roster of ABBM Voters Defective Carrier Envelopes - Phone or Email		STATE1 51851	STATE15 1851	2022.01.00	May offer
LULAC -46	(Document) Blank Roster of Voters with Defective Carrier - Returned to the Voter by Mail		STATE1 51850	STATE15 1850	2022.01.00	May offer
LULAC -47	(Document) Certificate of Appointment of Poll Watcher by a Candidate		STATE1 38589	STATE13 8590	2022.01.00	May offer
LULAC -48	(Document) Certificate of Appointment of Watcher by Political Party		STATE0 61384	STATE06 1385	2022.01.00	May offer
LULAC -49	(Document) Corrective Action Form for Carrier Envelope		STATE1 51849	STATE15 1849	2022.01.00	May offer
LULAC -50	(Document) Handbook for Election Judges and Clerks (2022)		STATE1 80624	STATE18 0704	2022.01.00	May offer
LULAC -51	(Document) Information About Returning Your Carrier Envelope		STATE1 38599	STATE13 8600	2022.01.00	May offer
LULAC -52	(Document) FAQs on ABBMs		STATE0 90855	STATE09 0870	2022.01.18	May offer
LULAC -53	(Document) Election Advisory No. 2022-07		STATE0 01577	STATE00 1593	2022.01.21	May offer

LULAC -54	(Document) Election Advisory No. 2022-08 - Opportunity to Correct Defects		STATE0 40194	STATE04 0221	2022.01.28	May offer
LULAC -55	(Document) Texas SOS Presentation - Reviewing Your ABBMs		STATE0 01667	STATE00 1712	2022.01.28	May offer
LULAC -56	(Document) Election Advisory No. 2022-09 - Poll Watcher Requirements		STATE0 93313	STATE09 3316	2022.02.04	May offer
LULAC -57	(Document) Training for EVBB/SVC Members on New Ballot by Mail Procedures		STATE0 44206	STATE04 4231	2022.02.08	May offer
LULAC -58	(Document) Training for EVBB/SVC Members on New Ballot by Mail Procedures (2022)		STATE0 34515	STATE03 4564	2022.03.22	May offer
LULAC -59	(Document) Training for EVBB/SVC Members on New Ballot by Mail Procedures		STATE1 42262	STATE14 2312	2022.04.14	May offer
LULAC -60	(Document) 2021 Legislative and Policy Updates		STATE0 85575	STATE08 5632	2022.04.20	May offer
LULAC -61	(Document) OAG document of election-related fraud offenses		STATE0 87323	STATE08 7339	2022.04.20	May offer
LULAC -62	(Document) Blank Oath of Assistance		STATE1 79016	STATE17 9017	2022.07.00	May offer
LULAC -63	(Document) Review of ABBMs and FPCAs (2022)		STATE1 34160	STATE13 4208	2022.09.20	May offer
LULAC -64	(Document) Training for EVBB/SVC Members on New Ballot by Mail Procedures		STATE1 43779	STATE14 3804	2022.10.11	May offer
LULAC -65	(Document) Texas House floor debate transcript		HJ_0007 740	HJ_00078 50	2023.01.30	May offer
LULAC -66	(Document) Dallas County voter spreadsheet		MS0177 01	MS17701	2021.12.13	May offer
LULAC -67	(Document) Early Voting Ballot Board & Signature Verification Committee Handbook for Election Judges and Clerks (2022)		STATE1 80535	STATE18 0585	2022.01.00	May offer
LULAC -68	(Email) from Harris EA to AFT		AFT0072 31	AFT0072 35	2019.03.20	May offer
LULAC -69	(Email) from Organizations representing elections officials to Rep. Roberts		TXLEG 0001787	TXLEG_0 001789	2019.03.20	May offer

LULAC -70	(Email) from OAG providing list of elections-related fraud		STATE0 90960	STATE09 0960	2021.03.10	May offer
LULAC -71	(Email) SOS email re “Weekend Comparative Process”		STATE0 19729	STATE01 9730	2021.12.20	May offer
LULAC -72	(Email) from Mexican American Legislative Caucus to SOS		STATE0 90732	STATE09 0739	2022.02.04	May offer
LULAC -73	(Email) Email from voter re “unable to verify my info”		STATE1 35962	STATE13 5962	2022.02.28	May offer
LULAC -74	(Email) Email from voter re “Need Identification Card Number in voter registration database, not old Driver’s License Number”		STATE1 33366	STATE13 3366	2022.04.11	May offer
LULAC -75	(Email) SOS email		STATE1 37751	STATE13 7751	2022.12.23	May offer
LULAC -76	(Written Discovery) State Defendants’ Responses and Objections to DOJ 2nd ROG				2022.05.02	May offer
LULAC -77	(Written Discovery) State Defendants’ Supplemental Responses and Objections to US 2nd ROG				2023.01.19	May offer
LULAC -78	(Written Discovery) 2023.02.15 - LULAC Plaintiffs’ RFAs to El Paso DA Defendant				2023.02.15	May offer
LULAC -79	(Written Discovery) 2023.02.15 LULAC Plaintiffs’ Interrogatories to El Paso DA Defendant				2023.02.15	May offer
LULAC -80	(Written Discovery) Dallas County, Defendant Scarpello Responses and Objections to State Defs Second RFP, First RFAs and Interrogatories				2023.02.22	May offer
LULAC -81	(Written Discovery) El Paso County, Defendant Lisa Wise Responses and Objections to State Def 1st RFA and ROG				2023.02.22	May offer
LULAC -82	(Written Discovery) 2023.03.17 Bexar County Defendant DA Gonzales R&Os to LULAC Plaintiffs RFAs				2023.03.17	May offer

LULAC -83	(Written Discovery) 2023.03.17 Bexar County Defendant DA Gonzales R&Os to LULAC Plaintiffs ROGs				2023.03.17	May offer
LULAC -84	(Written Discovery) 2023.03.17 Harris County Defendant Ogg's R&Os to LULAC Discovery Requests				2023.03.17	May offer
LULAC -85	(Written Discovery) 2023.03.17 Hidalgo County Defendant Palacios R&Os to Plaintiffs' First Set of Discovery Requests				2023.03.17	May offer
LULAC -86	(Written Discovery) OAG Defendant Responses and Objections to LULAC's First Set of Interrogatories				2023.03.17	May offer
LULAC -87	(Written Discovery) Bexar County, Defendant EA Callanen's Responses to LULAC Third Set of Interrogatories				2023.03.17	May offer
LULAC -88	(Written Discovery) Harris County, Defendant EA Supplemental Responses to State Defendants' 2nd Set of Interrogatories				2023.03.21	May offer
LULAC -89	(Written Discovery) Travis County, Defendant Limon- Mercado's Responses and Objections to LULAC Plaintiffs' 3rd Interrogatories				2023.03.23	May offer
LULAC -90	(Written Discovery) Travis County, Defendant Limon- Mercado's Responses and Objections to OCA Plaintiffs' 1st Interrogatories				2023.03.23	May offer
LULAC -91	(Written Discovery) Travis County, Defendant Limon- Mercado's Responses and Objections to State Defs' 2nd Interrogatories				2023.03.23	May offer
LULAC -92	(Written Discovery) Hidalgo County, Defendant Salinas Responses and Objections State Defendants 2nd ROGs				2023.03.29	May offer

LULAC -93	(Written Discovery) Hidalgo County, Responses and Objections to Plaintiffs' 3rd Interrogatories				2023.03.29	May offer
LULAC -94	(Written Discovery) 2023.03.30 Travis County Defendant Garza R&Os to LULAC Pls 1st RFA				2023.03.30	May offer
LULAC -95	(Written Discovery) 2023.03.30 Travis County Defendant Garza's Responses and Objections to LULAC Plaintiffs' 1st ROGs				2023.03.30	May offer
LULAC -96	(Written Discovery) Dallas [RFA] - 2023.03.31 Creuzot R&Os LULAC Pls RFA				2023.03.31	May offer
LULAC -97	(Written Discovery) Dallas [ROG] - 2023.03.31 Creuzot R&Os LULAC 1st ROG				2023.03.31	May offer
LULAC -98	(Written Discovery) El Paso County, Def. Lisa Wise's Responses and Objections to LULAC Plaintiffs' 3rd Interrogatories				2023.03.31	May offer
LULAC -99	(Written Discovery) El Paso County, Def. Wise's Responses and Objections to State Defs' 2nd ROG				2023.03.31	May offer
LULAC -100	(Written Discovery) Harris County, Tatum's Responses and Objections to LULAC 3rd Interrogatories				2023.04.04	May offer
LULAC -101	(Written Discovery) El Paso County, Def Wise Supp and Am Responses and Objections to LUPE Pls' Am. 3d Interrogatories				2023.04.17	May offer
LULAC -102	(Written Discovery) El Paso County, Def Wise Supp and Am Responses and Objections to Pls 1st Interrogatories				2023.04.17	May offer
LULAC -103	(Written Discovery) El Paso County, Wise Supp and Am Responses and Objections to State Defs 2nd Interrogatories				2023.04.17	May offer
LULAC -104	(Written Discovery) GOP, Int-Def's 2nd Supp Responses and Objections to Pls 1st ROG				2023.04.28	May offer

LULAC -105	(Written Discovery) Harris County, Amended Responses and Objections to LULAC Plaintiffs' Third Set Interrogatories				2023.05.05	May offer
---------------	--	--	--	--	------------	--------------

TABLE B – LULAC PLAINTIFFS' DEPOSITION DESIGNATIONS	
Transcript and Date	Transcript Pincite
<i>Attachment 1: April 20, 2022 Jacquelyn Callanen (Bexar Elections Administrator, 30(b)(6))</i>	
	Tr. 11:14–25
	Tr. 25:13–29:20
	Tr. 75:4–77:3
	Tr. 84:11–89:22
	Tr. 97:16–99:25
	Tr. 106:16–110:14
	Tr. 127:11–129:8
	Tr. 130:11–131:15
	Tr. 137:10–138:5
	Tr. 139:1–141:17
	Tr. 146:8–23
	Tr. 215:2–217:6
	Tr. 240:24–241:21
	Tr. 221:5–222:14

	Tr. 263:20–265:4
	Tr. 265:21–268:8
	Tr. 275:18–22
	Tr. 277:1–279:9
Attachment 2: January 30, 2023 Nicole Collier (Texas Representative)	
	Tr. 18:18–20:5
	Tr. 22:18–23:25
	Tr. 136:10–137:11
	Tr. 148:5–150:25
	Tr. 154:17–157:25
Attachment 3: May 11, 2022 Bridgette Escobedo (Travis County Elections Director, Travis County 30(b)(6))	
	Tr. 13:9–14:11
	Tr. 20:7–24:7
	Tr. 37:16–38:18
	Tr. 42:15–44:18
	Tr. 48:1–12
	Tr. 63:10–71:18
Attachment 4: April 25, 2023 Elaine Jones (AFT and TARA member)	
	Tr. 10:13–13:5
	Tr. 36:7–50:25
Attachment 5: April 22, 2022 Isabel Longoria (Harris County Elections Administrator 30(b)(6))	
	Tr. 77:24–78:7

	Tr. 109:11–110:11
<i>Attachment 6: April 29, 2022 Rivelino Lopez (Voter Registration Manager, Dallas County 30(b)(6))</i>	
	Tr. 20:18–22:24
	Tr. 22:12–24:25
<i>Attachment 7: March 21, 2023 Rachelle Obakozuwa (Director of Logistics, Harris County)</i>	
	Tr. 10:4–22
	Tr. 57:1–12
	Tr. 62:7–11
	Tr. 65:1–7
<i>Attachment 8: April 27, 2023 Alice Penrod (AFT and TARA member)</i>	
	Tr. 9:21–11:18
	Tr. 57:25–59:23
	Tr. 75:25–79:6
<i>Attachment 9: April 29, 2022 Tacoma Phillips (Mail Ballot Supervisor, Dallas County 30(b)(6))</i>	
	Tr. 73:18–79:20
	Tr. 104:1–25
	Tr. 109:3–113:16
	Tr. 119:9–121:11
	Tr. 135:8–136:14
	Tr. 155:14–156:23
<i>Attachment 10: May 10, 2022 Yvonne Ramon (Hidalgo Elections Administrator, 30(b)(6))</i>	
	Tr. 10:11–15:24
	Tr. 25:9–27:10
	Tr. 53:15–54:18
	Tr. 70:2–71:4
	Tr. 82:7–83:15

	Tr. 104:12–105:3
	Tr. 114:17–25
	Tr. 136:3–139:12
<i>Attachment 11: April 29, 2022 Michael Scarpello (Dallas County Elections Administrator, Dallas County 30(b)(6))</i>	
	Tr. 188:1–193:23
	Tr. 205:11–206:23
	Tr. 212:17–215:12
	Tr. 219:2–5
	Tr. 221:5–222:12
	Tr. 227:14–229:13
	Tr. 229:14–231:21
	Tr. 262:24–266:23
	Tr. 293:24–294:19
<i>Attachment 12: April 15, 2022 Lisa Wise (El Paso County Elections Administrator, El Paso County 30(b)(6))</i>	
	Tr. 14:3–19:3
	Tr. 45:16–48:11
	Tr. 89:2–98:25
	Tr. 100:3–106:16
	Tr. 156:23–159:14
	Tr. 198:19–200:14
	Tr. 212:16–20
	Tr. 167:7–23
<i>Attachment 13: April 18, 2023 Lisa Wise (El Paso County Elections Administrator, El Paso County 30(b)(6))</i>	
	Tr. 13:1–14:3
	Tr. 91:20–92:16
	Tr. 94:1–95:19
	Tr. 97:15–22
	Tr. 109:15–110:25

The highlighted deposition transcripts are attached hereto as **Exhibit A**. LULAC Plaintiffs' designations are highlighted in yellow.

Dated: July 28, 2023

Respectfully submitted,

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta*

Christopher D. Dodge*

Noah B. Baron*

Michael B. Jones*

Elena A. Rodriguez Armenta*

Daniela Lorenzo*

Marcos Mocine-McQueen*

Marisa A. O'Gara*

Omeed Alerasool*

ELIAS LAW GROUP LLP

250 Massachusetts Avenue NW, Suite 400

Washington, D.C. 20001

Telephone: (202) 968-4490

unkwonta@elias.law

cdodge@elais.law

nbaron@elias.law

mjones@elias.law

erodriguezarmenta@elias.law

dlorenzo@elias.law

mmcqueen@elias.law

mogara@elias.law

oalerasool@elias.law

Counsel for LULAC Plaintiffs

*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

On July 28, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Christopher D. Dodge
Christopher D. Dodge